

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

ERIN WILSON, individually and on behalf of
others similarly situated,

Plaintiff,

v.

COOKUNITY LLC,

Defendant.

Case No. 1:25-cv-03237-TRJ

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF’S COMPLAINT**

COMES NOW Defendant CookUnity Inc. (incorrectly identified herein as CookUnity LLC) (“CookUnity”), by and through its undersigned counsel, and respectfully moves this Court to extend its time to file a response to Plaintiff’s Class Action Complaint, stating as follows:

1. Plaintiff commenced this action by filing a Class Action Complaint (“Complaint”) on June 9, 2025 (ECF No. 1).
2. Defendant’s response is currently due on August 1, 2025 (ECF No. 9; Text Order dated June 27, 2025).
3. Defendant’s counsel was recently retained in this matter and requests additional time to investigate the allegations and prepare a response to the Complaint.
4. Defendant therefore respectfully requests that the Court extend its deadline to answer, move, or otherwise respond to the Complaint by three weeks, up to and including August 22, 2025.
5. The requested extension of time will not unduly delay the progress of this action, which has only just commenced.

6. This is Defendant's second motion for an extension of time, and it is made in good faith, and no party will be prejudiced by the relief sought herein.

7. The undersigned counsel has conferred with counsel for Plaintiff, who does not oppose this motion.

WHEREFORE, Defendant CookUnity respectfully requests that this Court enter an order providing it until August 22, 2025, to file a response to Plaintiff's Class Action Complaint.

Dated: July 24, 2025

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

s/ Francis X. Nolan, IV

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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record, on this 24th day of July, 2025.

s/ Francis X. Nolan, IV

Francis X. Nolan, IV (*pro hac vice*)